

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK
IN ADMIRALTY**

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LIBERTY MUTUAL INSURANCE COMPANY
a/s/o WATERFRONT ENTERPRISES, INC., and
WATERFRONT ENTERPRISES, INC.,

CIVIL ACTION

Plaintiffs,

Case No.: 12-CV-7061 (WHP)

-against-

BOUCHARD TRANSPORTATION CO., INC.
in personam, and M/V JANE A. BOUCHARD, her
engines, boilers, tackle, appurtenances, furnishings,
fittings, etc. *in rem*,

JOINT DISCOVERY PLAN


Defendants.

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This Joint Discovery Plan, is respectfully submitted in accordance with Rule 26(f), Fed. R. Civ. P.:

1. Initial disclosure pursuant to Rule 26(a)(1), Fed. R. Civ. P., shall be completed by January 14, 2013.
2. All fact discovery shall be completed no later than May 31, 2013.
3. The parties are to conduct discovery in accordance with the Federal Rules of Civil Procedure and the Local Rules of the Southern District of New York. The following interim deadlines may be extended by the written consent of all parties without application to the Court, provided all fact discovery is completed by the date set forth in paragraph 2 above:
 - a. Initial requests for production of documents to be completed by April 30, 2013.
 - b. Interrogatories to be completed by April 30, 2013.
 - c. Depositions to be completed by May 31, 2013.
 - d. Requests to Admit to be completed by April 30, 2013.
4. All expert discovery shall be completed no later than July 22, 2013.
5. A settlement conference shall be held on August 19, 2013.
6. A Joint Pre-trial Order shall be submitted by September 16, 2013.

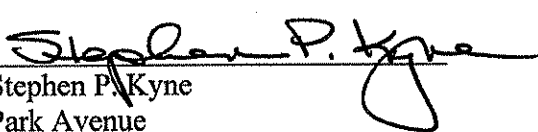
Dated: New York, New York
December 4, 2012

THE CHARTWELL LAW OFFICE, LLP.

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TRANSPORTATION CO., INC. in personam,
and M/V JANE A. BOUCHARD, her engines,
boilers, tackle, appurtenances, furnishings,
fittings, etc. in rem*